

Consequence Holdings, LLC  
4609 N. Wolcott Ave  
Chicago, IL 60640

October 25, 2018

Richard Liebowitz  
Liebowitz Law Firm, PLLC  
11 Sunrise Plaza, Suite 305  
Valley Stream, NY 11580

Mr. Lebowitz,

This letter is in response to the lawsuit filed on September 17, 2018, and received by our registered agent on September 25, 2018, as well as our preliminary email correspondence in which you granted us an extension for our response.

Be advised this is not a refusal to settle, but a notice pursuant to the complaint filed against Consequence Holdings, LLC, that your complaint is disputed and validation is requested.

It is our contention that there is no basis for this lawsuit. The lawsuit was filed in the Southern District of Illinois (St Louis, MO), which does not have jurisdiction over Consequence Holdings (Cook County, IL).

Second, your client did not register his photograph until well after a year of its initial publication, and thus, contend he is not entitled to the full benefits of protection, including statutory damages.

Third, Consequence Holdings disputes the claim that we intentionally and maliciously posted the photograph and removed its attribution. Upon receiving your initial notice, we promptly removed the photograph and sought to compensate the photographer at his normal licensing fee.

Lastly, the article in which the photograph was featured generated a grand total of 4,000 page views (per Google Analytics). At an industry standard CPM of \$10, Consequence Holdings earned \$40 from the article.

Consequence Holdings respectfully requests the following:

- Confirm you have a basis to sue us in the Southern District of Illinois (St Louis, MO), the venue the complaint was filed in, which, from our research, does not have jurisdiction over Consequence Holdings (Cook County, IL)
- Provide an explanation for how you arrived with the proposed settlement amount of \$25,000

- Include the photographer's normal licensing fee

Please understand this is an attempt to resolve this complaint that achieves a fair and equitable representation for both parties.

We look forward to hearing from you.

Regards,

Alexander Young  
Publisher  
Consequence Holdings, LLC

Rick Catinellac  
Partner  
Consequence Holdings, LLC